



**OFFICE OF THE DISTRICT ATTORNEY, Bronx
County**

DARCEL D. CLARK
District Attorney

215 East 161st Street
Bronx New York 10451

(718) 590-2000

January 12, 2020

EXCULPATORY AND IMPEACHING INFORMATION

Dear Counsel:

The People disclose the following evidence and information, including that which is known to police or other law enforcement agencies acting on the government's behalf in the case, that tends to: (i.) negate the defendant's guilt as to a charged offense; (ii.) reduce the degree of or mitigate the defendant's culpability as to a charged offense; (iii.) support a potential defense to a charged offense; (iv.) impeach the credibility of a testifying prosecution witness; (v.) undermine evidence of the defendant's identity as a perpetrator of a charged offense; (vi.) provide a basis for a motion to suppress evidence; or (vii.) mitigate punishment. Information under this paragraph is being disclosed even if it was not recorded in tangible form and irrespective of whether the People credit the information.¹ See CPL § 245.20(1)(k).

1) Jose Torres

- CCRB: stemming from incident on 12/02/2016. Substantiated allegation of Discourtesy-word and offensive language- race, which resulted in a command discipline.
- CCRB: stemming from incident on 5/1/2018. Substantiated allegation of abuse-refusal to provide name/shield number, which resulted in command instructions.
- Lawsuit: Lopez, Adam. Stemming from incident on 9/15/2016, disposition \$30,000.
- Lawsuit: Miguel, Ervin. Stemming from incident on 12/28/2016, disposition \$37,500.
- Lawsuit: Mouzon, Adam. Stemming from incident on 6/14/2016, disposition \$15,000.
- Lawsuit: Palermo, Hector. Stemming from incident on 4/9/2013, disposition \$35,000.
- Lawsuit: Reape, Raqunna. Stemming from incident on 5/22/2015, disposition \$70,000.

¹ The People will disclose the information expeditiously upon its receipt and shall not delay disclosure if it is obtained earlier than the time period for disclosure in CPL § 245.10(1).

- Lawsuit: Reyes, Norma. Stemming from incident on 5/15/2016, disposition \$52,500.
- 2) Charles Rodriguez
- Lawsuit: Hill, Jonathan. Stemming from incident on 6/9/2012, disposition \$25,500.
 - Lawsuit: Hughes, Nyema. Stemming from incident on 6/9/2012, disposition \$6,000.
 - Lawsuit: Konadu-Adjei, Monica. stemming from incident on 1/18/2003, disposition \$10,000.
 - Lawsuit: Mancusi, Michael stemming from incident on 4/2/2002, disposition \$35,000.
 - Lawsuit: Soto, Brian stemming from incident on 6/9/2012, disposition \$15,000.

Respectfully submitted,

Danielle Ciccodicola
Assistant District Attorney/Not Admitted
Trial Bureau 40
265 East 161 Street
Bronx, NY 10451
(718) 838-7347